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DOWNTOWN PROJECT, LLC and
6 GOLD SPIKE

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 SAVANNAH ELFBERG,

12 Plaintiff,

13 vs.

14 DOWNTOWN PROJECT, LLC, a Limited
Liability Company; GOLD SPIKE, a
15 Nevada business entity,

16 Defendants.
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Case No. 2:17-cv-02450-JAD-PAL

**STIPULATION FOR EXTENSION OF
TIME TO FILE RESPONSIVE PLEADING**

[FIRST REQUEST]

18 Pursuant to LR IA 6-1 and LR 7-1, Plaintiff SAVANNAH ELFBERG ("Plaintiff") and
19 Defendants DOWNTOWN PROJECT, LLC and GOLD SPIKE ("Defendants"), by and through
20 their respective counsel, do hereby stipulate and agree to an extension of thirty (30) days,
21 up to and including Wednesday, November 29, 2017, for Defendants to file their first
22 responsive pleading to Plaintiff's Complaint.

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1 This Stipulation is made in good faith and not for purposes of delay as defense
2 counsel has recently been retained and needs sufficient time to investigate the allegations
3 of the Complaint. Additionally, counsel for the parties are discussing the identity of the
4 proper defendant in this matter which employed Plaintiff. The parties believe that an
5 amended complaint will likely be forthcoming in order to narrow the causes of action and
6 identify the proper parties so that the filing of a Rule 12(b)(6) motion is avoided.
7 Additionally, the parties are discussing the potential for early resolution of this matter.

8 Dated: October 26, 2017

Dated: October 26, 2017

9
10 /s/Trevor J. Hatfield
11 TREVOR J. HATFIELD, ESQ.
HATFIELD & ASSOCIATES, LTD.

12 Attorneys for Plaintiff
13 SAVANNAH ELFBERG

/s/Sandra Ketner
SANDRA KETNER, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant
DOWNTOWN PROJECT, LLC and GOLD SPIKE

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16 **ORDER**

17 IT IS SO ORDERED.

18 
19 U.S. DISTRICT/MAGISTRATE JUDGE

20 Dated this 31st day of October, 2017.
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1 **PROOF OF SERVICE**

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3 I am a resident of the State of Nevada, over the age of eighteen years, and

4 not a party to the within action. My business address is 200 S. Virginia Street, 8th Floor,

5 Reno, Nevada 89501. On October 26, 2017, I served the within document(s):

6 **STIPULATION FOR EXTENSION OF TIME TO FILE**

7 **RESPONSIVE PLEADING**

8 ☒ By **CM/ECF Filing** – Pursuant to FRCP 5(b)(3) and LR 5-4, the above-

9 referenced document was electronically filed and served upon the parties

10 listed below through the Court's Case Management and Electronic Case

11 Filing (CM/ECF) system:

12 Trevor J. Hatfield, Esq.

13 HATFIELD & ASSOCIATES, LTD.

14 703 South Eighth Street

15 Las Vegas, NV 89101

16 thatfield@hatfieldlawassociates.com

17 I am readily familiar with the firm's practice of collection and processing

18 correspondence for mailing and for shipping via overnight delivery service. Under that

19 practice it would be deposited with the U.S. Postal Service or if an overnight delivery

20 service shipment, deposited in an overnight delivery service pick-up box or office on the

21 same day with postage or fees thereon fully prepaid in the ordinary course of business.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on October 26, 2017, at Reno, Nevada.

24 /s/Esperansa Reinold

25 ESPERANSA REINOLD

26 Firmwide:150792056.1 092307.1000